

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

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YOTAM MAROM AND MIRIAM ROCEK,

*Plaintiffs,*

15 CV 2017 (PKC)(SN)

-against-

NYPD SERGEANT FIOR BLANCO, NYPD LEGAL  
BUREAU LIEUTENANT DANIEL ALBANO,  
NYPD LEGAL BUREAU DETECTIVE KENNETH  
O'DONNELL, NYPD OFFICER MICHAEL  
GALGANO, SHIELD NO. 2671, NYPD OFFICER  
CYNTHIA BOYLE, SHIELD 06663,

**DECLARATION OF JESSICA  
MASSIMI IN SUPPORT OF  
PLAINTIFF'S MOTION  
IN LIMINE**

*Defendants.*

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**JESSICA MASSIMI**, pursuant to 28 U.S.C. § 1746, and subject to penalty of perjury, declares the following is true and correct:

1. I am an attorney duly admitted to practice law before this Court.
2. I represent Plaintiff, Miriam Rocek, in this matter. As such, I am fully familiar with the facts and circumstances of this action. This declaration is submitted to put forth certain documents before this Court in support of Plaintiff's motion *in limine*.
3. Annexed hereto as Exhibit "1" is an excerpt of the Defendant City of New York's answers to interrogatories in another matter, *Gyasi v. The City of New York, et al.*, 5 CV 9453 (SAS)(GWG).
4. Annexed hereto as Exhibit "2" is an excerpt of a transcript of a proceeding from *Gyasi v. The City of New York, et al.*, 5 CV 9453 (SAS)(GWG).
5. Annexed hereto as Exhibit "3" are excerpts of a transcript of a proceeding from *Williams v. The City of New York, et al.*, 11 CV 5202 (JGK).

6. Annexed hereto as Exhibit “4” are excerpts of a pretrial hearing in *Perez v. Duran*, 11 Civ. 5399 (JGK) (S.D.N.Y. Sept. 18, 2014).

DATED: January 24, 2020  
New York, NY

/S/

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